

1 JOHN L. BURRIS, Esq./ State Bar #69888
2 BENJAMIN NISENBAUM, Esq./State Bar #222173
3 LAW OFFICES OF JOHN L. BURRIS
4 Airport Corporate Centre
5 7677 Oakport Street, Suite 1120
6 Oakland, California 94621
7 Telephone: (510) 839-5200 Facsimile: (510) 839-3882

8 Attorneys for Plaintiffs

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

KATHLEEN ESPINOSA, individually and as
personal representative of the Estate of decedent
ASA SULLIVAN; A.S., by and through his
Guardian ad Litem, NICOLE GUERRA;

Case No. C 06 04686 JSW

**STIPULATION AND (PROPOSED) ORDER
ALLOWING PLAINTIFFS LEAVE TO
FILE FIRST AMENDED COMPLAINT**

Plaintiffs,

vs.

CITY AND COUNTY OF SAN FRANCISCO,
a municipal corporation; HEATHER FONG, in
her capacity as Chief of Police for the CITY
AND COUNTY OF SAN FRANCISCO; JOHN
KEESOR, individually, and in his capacity as a
police officer for the CITY AND COUNTY OF
SAN FRANCISCO; MICHELLE ALVIS,
individually and in her capacity as a police
officer for the CITY AND COUNTY OF SAN
FRANCISCO; PAUL MORGADO, individually
and in his capacity as a police officer for the
CITY AND COUNTY OF SAN FRANCISCO;
and, San Francisco police officers DOES 1-25,
inclusive,

Defendants.

/

THE PARTIES hereby stipulate and agree that Plaintiffs may file a First Amended Complaint
in this matter as agreed upon review by Defendants' of Plaintiff Proposed First Amended Complaint.

1 THE PARTIES further stipulate and agree that Defendants shall answer the First Amended
2 Complaint within thirty (30) days from the date of service of Plaintiffs' First Amended Complaint
3 upon Defendants.

4 IT IS SO STIPULATED.

5 Dated: January 26, 2007

The Law Offices of John L. Burris

7 _____/s/
John L. Burris
8 Attorney for Plaintiff

9 Dated: January 26, 2007

10 DENNIS J. HERRERA
City Attorney
11 JOANNE HOEPER
Chief Trial Attorney
12 BLAKE P. LOEBS
Chief of Civil Rights Litigation
13 PETER J. KEITH
Deputy City Attorney

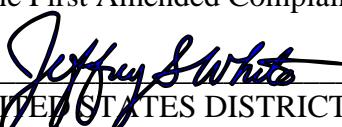
16 By: _____ //s//
17 BLAKE P. LOEBS

18 Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO,
19 HEATHER FONG, in her official capacity,
JOHN KESSOR, MICHELLE ALVIS and
20 PAUL MORGADO

21 (PROPOSED) ORDER

22 PURSUANT TO STIPULATION, Plaintiffs are hereby granted leave to file a First Amended
23 Complaint within ten (10) days of this Order. Defendants shall file an Answer to the First Amended
24 Complaint within thirty (30) days of service of the First Amended Complaint.

25 Dated: February 15, 2007

26 
27 UNITED STATES DISTRICT JUDGE